REMARKS

Claims 1-15 are pending and stand rejected. Claim 15 is added. Claims 1-6 and 8-13 were rejected. Claims 7 and 14 were objected to but indicated as allowable. Assignee appreciates Examiner's indication of allowable subject matter.

Claims 1 and 4 were rejected under 35 U.S.C. § 101. Assignee has amended claims 1 and 4, and it is respectfully submitted that this rejection is overcome.

Claim 13 was rejected under 35 U.S.C. § 112. Assignee has amended claim 13 and it is respectfully submitted that this rejection is overcome.

Claim 1 was rejected under 35 U.S.C. § 103(a) as being obvious from the combination of Inoue in view of Kadono. Claim 8 was rejected under 35 U.S.C. § 102(b) as being anticipated by Inoue. Claims 1 and 8 recite, among other limitations, "storing a portion of a first frame in a row of memory; and storing a portion of a second frame <u>in the row of memory</u>".

Examiner indicated (in the rejection of claim 8) that Inoue taught "storing a portion (macroblock) of a first frame in a first one or more rows of memory (Figs. 4B and 6), and storing a portion (macroblock) of a second frame <u>in a second one or more rows of memory</u> (Figs. 4B and 6)(col. 9, lines 7-67; col. 10, lines 1-5)". Examiner has indicated that "Regarding claims 1-2 and 4, all of the claimed subject matter have been met by Inoue as discussed above with respect to claims 8-11."

Assignee respectfully submits that even if Inoue teaches "storing a portion (macroblock) of a first frame in a first one or more rows of memory (Figs. 4B and 6), and storing a portion (macroblock) of a second frame <u>in a</u>

second one or more rows of memory (Figs. 4B and 6)(col. 9, lines 7-67; col. 10, lines 1-5)", Inoue does not teach "storing a portion of a first frame in a row of memory; and storing a portion of a second frame *in the row of memory*".

Accordingly, Assignee respectfully traverses the rejection to claims 1 and 8 and requests that Examiner withdraw the rejections, as well as the rejections to dependent claims 2, 3, 9, and 10.

Claim 4 was rejected under 35 U.S.C. § 103(a) as being obvious from the combination of Inoue in view of Kadono. Claim 11 was rejected under 35 U.S.C. § 102(b) as anticipated by Inoue. Examiner has indicated that "Regarding claims 1-2 and 4, all of the claimed subject matter have been met by Inoue as discussed above with respect to claims 8-11."

Claims 4 and 11 are amended to recite, among other limitations, "storing a top macroblock row of a first frame in a first one or more rows of memory; storing a top macroblock row of a second frame in a second one or more rows of memory; and a particular one of the first one or more rows of memory being adjacent to a particular one of the second one or more rows of memory." Assignee respectfully submits that the combination of Inoue does not teach the foregoing.

In Inoue, "Fig. 6 is a memory map diagram which shows how the memory rows that constitute field A0 shown in Fig. 4B are stored in the memory 212. As shown in Fig. 6, the memory rows of macroblocks are identified by their device number (D0 or D1), their bank within the device (L or U) and their memory row number within the bank (R0 through R67). The next image field would begin at memory row R68." Col. 9, Lines 45-52.

Inoue Figure 6 is copied below, Assignee has highlighted certain portions.

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  610   612
   |     |
┌─────────────────────────────────────────────────────────────────────────────┐
│ D0:L:R0 │D0:U:R0│ D0:L:R1 │ D0:U:R1 │ D0:L:R2 │ D0:U:R2 │ D0:L:R3 │ D0:U:R3 │
│ D1:L:R0 │D1:U:R0│ D1:L:R1 │ D1:U:R1 │ D1:L:R2 │ D1:U:R2 │ D1:L:R3 │ D1:U:R3 │
└─────────────────────────────────────────────────────────────────────────────┘
  D0:L:R4  D0:U:R4  D0:L:R5  D0:U:R5  D0:L:R6  D0:U:R6  D0:L:R7  D0:U:R7
  D1:L:R4  D1:U:R4  D1:L:R5  D1:U:R5  D1:L:R6  D1:U:R6  D1:L:R7  D1:U:R7
  D0:L:R8  D0:U:R8  D0:L:R9  D0:U:R9  D0:L:R10 D0:U:R10 D0:L:R11 D0:U:R11
  D1:L:R8  D1:U:R8  D1:L:R9  D1:U:R9  D1:L:R10 D1:U:R10 D1:L:R11 D1:U:R11
  D0:L:R12 D0:U:R12 D0:L:R13 D0:U:R13 D0:L:R14 D0:U:R14 D0:L:R15 D0:U:R15
  D1:L:R12 D1:U:R12 D1:L:R13 D1:U:R13 D1:L:R14 D1:U:R14 D1:L:R15 D1:U:R15
  D0:L:R16 D0:U:R16 D0:L:R17 D0:U:R17 D0:L:R18 D0:U:R18 D0:L:R19 D0:U:R19
  D1:L:R16 D1:U:R16 D1:L:R17 D1:U:R17 D1:L:R18 D1:U:R18 D1:L:R19 D1:U:R19
  D0:L:R20 D0:U:R20 D0:L:R21 D0:U:R21 D0:L:R22 D0:U:R22 D0:L:R23 D0:U:R23
  D1:L:R20 D1:U:R20 D1:L:R21 D1:U:R21 D1:L:R22 D1:U:R22 D1:L:R23 D1:U:R23
  D0:L:R24 D0:U:R24 D0:L:R25 D0:U:R25 D0:L:R26 D0:U:R26 D0:L:R27 D0:U:R27
  D1:L:R24 D1:U:R24 D1:L:R25 D1:U:R25 D1:L:R26 D1:U:R26 D1:L:R27 D1:U:R27
  D0:L:R28 D0:U:R28 D0:L:R29 D0:U:R29 D0:L:R30 D0:U:R30 D0:L:R31 D0:U:R31
  D1:L:R28 D1:U:R28 D1:L:R29 D1:U:R29 D1:L:R30 D1:U:R30 D1:L:R31 D1:U:R31
  D0:L:R32 D0:U:R32 D0:L:R33 D0:U:R33 D0:L:R34 D0:U:R34 D0:L:R35 D0:U:R35
  D1:L:R32 D1:U:R32 D1:L:R33 D1:U:R33 D1:L:R34 D1:U:R34 D1:L:R35 D1:U:R35
  D0:L:R36 D0:U:R36 D0:L:R37 D0:U:R37 D0:L:R38 D0:U:R38 D0:L:R39 D0:U:R39
  D1:L:R36 D1:U:R36 D1:L:R37 D1:U:R37 D1:L:R38 D1:U:R38 D1:L:R39 D1:U:R39
  D0:L:R40 D0:U:R40 D0:L:R41 D0:U:R41 D0:L:R42 D0:U:R42 D0:L:R43 D0:U:R43
  D1:L:R40 D1:U:R40 D1:L:R41 D1:U:R41 D1:L:R42 D1:U:R42 D1:L:R43 D1:U:R43
  D0:L:R44 D0:U:R44 D0:L:R45 D0:U:R45 D0:L:R46 D0:U:R46 D0:L:R47 D0:U:R47
  D1:L:R44 D1:U:R44 D1:L:R45 D1:U:R45 D1:L:R46 D1:U:R46 D1:L:R47 D1:U:R47
  D0:L:R48 D0:U:R48 D0:L:R49 D0:U:R49 D0:L:R50 D0:U:R50 D0:L:R51 D0:U:R51
  D1:L:R48 D1:U:R48 D1:L:R49 D1:U:R49 D1:L:R50 D1:U:R50 D1:L:R51 D1:U:R51
  D0:L:R52 D0:U:R52 D0:L:R53 D0:U:R53 D0:L:R54 D0:U:R54 D0:L:R55 D0:U:R55
  D1:L:R52 D1:U:R52 D1:L:R53 D1:U:R53 D1:L:R54 D1:U:R54 D1:L:R55 D1:U:R55
  D0:L:R56 D0:U:R56 D0:L:R57 D0:U:R57 D0:L:R58 D0:U:R58 D0:L:R59 D0:U:R59
  D1:L:R56 D1:U:R56 D1:L:R57 D1:U:R57 D1:L:R58 D1:U:R58 D1:L:R59 D1:U:R59
  D0:L:R60 D0:U:R60 D0:L:R61 D0:U:R61 D0:L:R62 D0:U:R62 D0:L:R63 D0:U:R63
  D1:L:R60 D1:U:R60 D1:L:R61 D1:U:R61 D1:L:R62 D1:U:R62 D1:L:R63 D1:U:R63
  D0:L:R64 D0:U:R64 D0:L:R65 D0:U:R65 D0:L:R66 D0:U:R66 D0:L:R67 D0:U:R67
  D1:L:R64 D1:U:R64 D1:L:R65 D1:U:R65 D1:L:R66 D1:U:R66 D1:L:R67 D1:U:R67
```

FIG. 6

Assignee calls Examiner's attention to the part of the figure surrounded by the rectangular box. Note that it includes rows, R0, R1, R2 and R3. It is respectfully submitted that rows R0, R1, R2, and R3 would not be adjacent to any rows of the next image field, if the "next image field would begin at memory row R68".

Assignee respectfully submits that claims 4 and 11, as now amended are allowable.

Additionally, Examiner indicated claims 7 and 14 recite novel features "storing a second macroblock row of the first frame in a fourth one or more rows of memory; the third one or more rows of memory beign continuous; and wherein a particular one of the fourth one or more rows is adjacent to another particular one of the third one or more rows of memory."

Assignee has added claim 15 which also recites these novel features. It is respectfully submitted that claim 15 is allowable.

CONCLUSION

For at least the foregoing reasons, each of the pending claims are allowable, thereby placing the application in a condition for allowance. Examiner is requested to pass this case to issuance.

The Commissioner is hereby authorized to charge any deficiency in the amount enclosed or any additional fees which may be required under 37 CFR 1.16 or 1.17 to Deposit Account No. 13-0017 in the name of McAndrews, Held & Malloy, Ltd.

RESPECTFULLY SUBMITTED,

Date: January 14, 2008

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